

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

In re: NEURONTIN MARKETING AND SALES PRACTICES LITIGATION : MDL Docket No. 1629  
: Master File No. 04-10981  
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THIS DOCUMENT RELATES TO: : Judge Patti B. Saris  
: ----- X  
LAURA ALLEN, et al. v. PFIZER INC., et al., :  
Docket No. 05-10797-PBS :  
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**JOINT MOTION FOR ENLARGEMENT OF TIME  
TO RESPOND TO COMPLAINT**

Defendants, Pfizer Inc. and Parke-Davis, a division of Warner-Lambert Company (together, "Defendants"), and Plaintiffs hereby move, pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, for a 30-day enlargement of the time within which Defendants must answer, move, or otherwise respond to the Complaint. The grounds for this motion are:

1. This action was removed to this Court on April 20, 2005, from the Superior Court of the Commonwealth of Massachusetts. Pursuant to Rule 81(c) of the Federal Rules of Civil Procedure, Defendants' response to Plaintiffs' Complaint otherwise would be due on or before April 28, 2005.

2. Plaintiffs, while joining in this motion, have advised that they anticipate filing a Motion to Remand. Pursuant to 28 U.S.C. § 1447(c), such a motion must be filed on or before May 20, 2005.

3. In addition, the Complaint is lengthy. The proceedings relating to the motion to remand aside, the preparation of an appropriate response would require additional time.

4. The parties therefore request that Defendants' time to answer, move, or otherwise respond to the Complaint be enlarged by 30 days, to May 27, 2005, so as to provide Defendants adequate time to prepare a response to the Complaint.

WHEREFORE, the parties respectfully request that the Court enlarge the time within which Defendants must answer, move, or otherwise respond to the Complaint by 30 days, to May 27, 2005.

Dated: April 27, 2005

LAURA ALLEN, ADMINISTRATRIX OF  
THE ESTATE OF THE LATE DANIEL  
ALLEN, TIMOTHY BRIDGES, and  
ALFRED MORABITO, individually  
and on behalf of themselves and all others  
similarly situated,

By their Attorneys,

s/Robert J. Bonsignore

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By their Attorneys,

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